

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

MARY SEGUIN,
pro se

Plaintiff,

VS.

Civil Action No. 1:23-cv-126-WES-PAS
U.S. Court of Appeals for the First Circuit Appeal No. 23-1967
Related Appeal No. 23-1978
Related Appeal No. 23-1851

RHODE ISLAND DEPARTMENT OF HUMAN SERVICES in its official capacity; MICHAEL D. COLEMAN, DEBORAH A. BARCLAY in their individual and official capacities; RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES in its official capacity; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS, TIMOTHY FLYNN, LISA PINSONNEAULT, CARL BEAUREGARD, PRISCILLA GLUCKSMAN, JOHN LANGLOIS, PAUL GOULD, in their individual and official capacities; RHODE ISLAND STATE COURT SYSTEM in its official capacity; PAUL A. SUTTELL in his individual and official capacity as EXECUTIVE HEAD OF RHODE ISLAND STATE COURT SYSTEM; RHODE ISLAND ADMINISTRATIVE OFFICE OF STATE COURTS in its official capacity; RHODE ISLAND ADMINISTRATIVE OFFICE OF THE SUPERIOR COURT in its official capacity; RHODE ISLAND JUDICIAL COUNCIL in its official capacity; RHODE ISLAND SUPERIOR COURT in its official capacity; RHODE ISLAND SUPERIOR COURT JUDICIAL COUNCIL in its official capacity; THE JUDICIAL TECHNOLOGY CENTER in its official capacity; JULIE HAMIL, MARISA BROWN, JOHN JOSEPH BAXTER, JR., JUSTIN CORREA in their individual and official capacities; RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL in its official capacity; RHODE ISLAND OFFICE OF THE ATTORNEY GENERAL OPEN GOVERNMENT UNIT in its official capacity; ADAM D. ROACH, PETER NERONHA in their official and individual capacities; TYLER TECHNOLOGIES, INC.; GERO MEYERSIEK

Defendants

PLAINTIFF'S Fed. R. App. P. 8(a)(1)(A) MOTION TO STAY

Plaintiff, proceeding from and as a citizen of Texas, respectfully moves this Court, pursuant to Fed. R. App. P. 8(a)(1)(A), to stay the March 7, 2024 and March 8, 2024 denials and their respective tolling of time to file the Notice of Appeal appealing from the district court's March 7, 2024 and March 8, 2024 denials of Plaintiff's motions for extension of time filed

pursuant to Fed. R. App. P. 4(a)(5)(A)(i) that Plaintiff filed with the Clerk of the District Court on March 1, 2024 (ECF 49) and March 7, 2024 (ECF 53), pending the United States Court of Appeals for the First Circuit's resolution of Plaintiff-Appellant's FRAP 27(b), 26(b)(1) and 4(a)(5)(A) motion to reconsider filed on March 8, 2024. See aforesaid Motion attached herewith as **Exhibit A**.

Plaintiff respectfully requests the Court to resolve this instant motion by **the end of day, March 8, 2024**, requesting such time based on the Court's record of speedy two back-to-back denials of Plaintiff's two Fed. R. App. P. 4(a)(5) motions filed on March 1, 2024 and March 7, 2024, and in the interest of judicial economy.

In support of this motion, Plaintiff states that at this juncture, Plaintiff can appeal the Court's denials, with the Plaintiff-unintended result of yet another appeal case appealing this Court's final judgment. Plaintiff raises it is in the interest of judicial economy to stay the tolling of time to file yet another notice of appeal pending appellate adjudication of Plaintiff's March 8, 2024 Fed. R. App. P 27(b), 26(b)(1) and 4 motion to reconsider currently pending before the Court of Appeals.

Plaintiff hereby reserves any and all her appellate rights, including her right to file a Fed. R. App. P 8(a)(2) motion if necessary.

CONCLUSION

WHEREFORE, Plaintiff requests this district Court to GRANT this motion

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 8, 2024, I filed the within Motion with the Clerk of the Court via email at RID_ECF_INTAKE@rid.uscourts.gov and with the Clerk of the Court of

the United States Court of Appeals for the First Circuit through the Court's ECF, notice of which is electronically transmitted by the ECF.

Respectfully submitted,

Mary Seguin

Pro Se

/s/ Mary Seguin

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Dated: March 8, 2024